

District Judge James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIO CURY and TAKAO YAMADA,

Plaintiffs,

v.

DEPARTMENT OF STATE, and
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Case No. 2:23-cv-00499-JLR

SUPPLEMENTAL JOINT STATUS
REPORT

JOINT STATUS REPORT

Pursuant to the Court's July 11, 2023 Minute Order (Dkt. 8), the parties are filing this supplemental joint status report informing the Court of the current status of Defendants' productions and a proposed schedule for the completion of remaining productions.

Defendants' Status:

Plaintiffs' FOIA requests are addressed to four agencies: United States State Department (State), United States Department of Homeland Security (DHS), Customs and Border Protection (CBP), and United States Citizenship and Immigration Services (USCIS). All agencies have been engaged in the search process since receiving the FOIA requests, based on available

resources and other pending requests. DHS has completed its search and did not locate any documents. CBP has completed its search and produced all relevant documents. State and USCIS are finalizing their searches now. If documents are located responsive to those searches, then those agencies will review and produce to Plaintiffs subject to any statutory withholdings.

Defendants' Proposed Schedule:

Based on Defendants' current status, Defendants propose the following schedule:

1. Defendants State and USCIS will complete all searches by September 18, 2023.
2. Defendants State and USCIS will produce all responsive documents by December 18, 2023.
3. The parties will meet and confer to discuss any issues with the productions and propose a schedule for motion practice, if necessary, by January 18, 2024.
4. The parties will file a Second Supplemental Joint Status Report and proposed schedule, if necessary, on or before January 26, 2024.

If Defendants need additional time because of unforeseen circumstances, Defendants will promptly notify Plaintiffs and meet and confer to propose an amended schedule if good cause exists.

Plaintiffs agree with the proposed schedule.

1 Dated this 18th day of August 2023.

2 Respectfully submitted,

3 s/ Kel McClanahan

4 KEL MCCLANAHAN, WSBA #60671

5 National Security Counselors

4702 Levada Terrace

6 Rockville, MD 20853

Phone: 301-728-5908

7 Fax: 240-681-2189

Email: kel@nationalsecuritylaw.org

8 *Attorney for Plaintiffs*

9 TESSA M. GORMAN

Acting United States Attorney

10 s/ Nickolas Bohl

11 NICKOLAS BOHL WSBA #48978

Assistant United States Attorney

12 United States Attorney's Office

700 Stewart Street, Suite 5220

13 Seattle, Washington 98101-1271

Phone: 206-553-4639

14 Fax: 206-553-4067

Email: nickolas.bohl@usdoj.gov

15 *Attorney for Defendants*